

From: [Jay Field](#)
To: Robert.Neely@noaa.gov
Cc: [Eric Blischke/R10/USEPA/US@EPA](#); [Chip Humphrey/R10/USEPA/US@EPA](#); [Ron Gouguet](#)
Subject: Re: NOAA draft comments on benthic approach report
Date: 07/03/2006 12:30 PM

Rob/Chip/Eric,
Rob's quick summary intro section is not entirely consistent with our discussion in Centralia. I've included a revised version below. Please call me if you have any questions.
thanks,
Jay

In short, our primary concerns are as follows:

- 1) The proposed threshold numbers for Total PAH as derived from the Floating Percentile Model (FPM) are patently unacceptable and should be discarded. Values for PAHs should be based on NOAA's Logistic Regression Model (LRM) or freshwater consensus PECs (MacDonald, D. D., C. G. Ingersoll, et al. 2000).
- 2) NOAA's LRMs for *Hyaella* growth and survival (pooled) Level 2 should be used as an additional interpretive tool. A preliminary analysis of the results of both models suggests significant overlap in results (i.e., in the delineation of areas of no-risk vs. risk) which may help to focus additional lines of evidence on areas where modeled risk to benthos is uncertain. Results of both the FPM and LRM should be carried forward.
- 3) The results for the *Hyaella* growth and survival endpoint should be included in the identification potential areas of concern.

Robert.Neely wrote:

Hey Eric,

Jay's email was restored. I've made some slight editorial changes to his comments and added an introductory section which neither he nor Ron have seen, but it attempts to lay out the three key issues (as we discussed). I'm submitting these comments to you and Chip for the moment as draft in the event Ron and/or Jay and/or you and Chip have any additional thoughts or questions. I'll hold on a broader circulation until sometime next week.

Have an extraordinary weekend.

-R

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